

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

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In Re:		:
		:
HEATHER MOORE		: CHAPTER 13
xxx-xx-7325		:
		: CASE NO. 20-12881/AMC
GREGORY A MOORE, II		:
xxx-xx-5096		:
		:
Debtor.		:
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**OBJECTION TO CONFIRMATION OF PLAN**

Secured Creditor, First Guaranty Mortgage Corporation, the holder of a mortgage on the real property of the debtors commonly known as 2832 Phipps Avenue, Willow Grove, PA 19090, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan proposed by the Debtor in the event that the Debtor has failed to make post-petition mortgage payments as required by the proposed plan and/or as required by 11 *U.S.C.* Section 1322 and 1326, *et seq.*

Further, objection is made to confirmation of the proposed Plan in the event that:

- (a) the Debtors have failed to make all required payments to the Standing Trustee pursuant to 11 *U.S.C.* Section 1326;
- (b) the Debtors seek to modify the rights of Secured Creditor, which is the holder of a claim secured only by a security interest in real property that is the principal residence of the Debtors;
- (c) the proposed plan fails to comply with the requirements of the Bankruptcy Code and is not proposed in good faith;
- (d) the proposed plan does not provide that Secured Creditor retain its lien;
- (e) the value of the property to be distributed to Secured Creditor under the plan is less than the allowed amount of its claim;
- (f) the proposed plan is not feasible;

- (g) the proposed plan fails to comply with other applicable provisions of Title 11;
- (h) the proposed plan fails to provide for Secured Creditor's claim as provided for in its Proof of Claim.

Wherefore, FGMC respectfully requests that the Court deny confirmation of the plan.

Respectfully submitted,  
Romano Garubo & Argentieri

/s/EMMANUEL J. ARGENTIERI  
EMMANUEL J. ARGENTIERI

Date: 9/8/20

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